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December 11, 2024

Hon. Ona T. Wang
US Magistrate Judge
500 Pearl Street
New York, New York 10007

Re: Yitzhak, et al. v. Verner, et al.
Case No.: 1:23-cv-02084

Dear Judge Wang:

Kindly accept this letter in further support of Plaintiffs' letter motion originally filed on November 16, 2024. Defendants failed to provide the overdue discovery by the date directed by the Court and a letter motion to strike the Defendants' Answer and seeking other relief was filed with the Court.

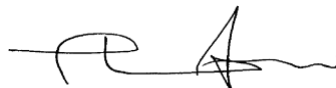
Nearly 3 weeks after the due date, Defendants provided documents purportedly in response to the discovery demands. For the reasons set forth in correspondence dated December 6, 2024, attached, the discovery produced – while voluminous – was largely not responsive, nor was it organized in response to the discovery demands, nor was it organized in any meaningful way and the production omitted attachments referenced in those few emails that were provided.

This supplemental letter is provided to the Court to advise of the developments since the filing of the letter motion. I respectfully advise the Court that when I received no response to my December 6, 2024 letter, I emailed Defendants' counsel requesting a response. Although counsel first denied receiving the letter, then admitting she received it, there has been no further response to Plaintiffs' continued good faith efforts herein.

Plaintiffs respectfully reiterate the request for permission to move to strike the Answer of the Defendants for their continued refusal to cooperate with discovery and their disobedience of this Court's very clear directives, seeking the costs, fees and legal fees for the making of the application.

Respectfully,

THE WEINSTEIN GROUP, P.C.



LLOYD J. WEINSTEIN, Esq.